

Greg Rogers
Deputy General Counsel
Venture III
900 Main Campus Drive
Raleigh, NC 27606
(919) 439-5399
grogers@bandwidth.com

March 22, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW Room TW-A325
Washington, DC 20554

Re: Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, PS Docket No. 11-153; E911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196; Framework for Next Generation 911 Deployment, PS Docket No. 10-255; In the Matter of Petitions for Waiver of Commission's Rules Regarding Access to Numbering Resources, CC Docket 99-200

Dear Ms. Dortch:

On Wednesday March 20, 2013, Ray Paddock, Vice President of Emergency Product Portfolio, Jay Slater, Sr. Manager of Emergency Product Portfolio and I of Bandwidth.com, Inc. ("Bandwidth") met with Henning Schulzrinne, Chief Technology Officer, David Furth, David Siehl, Erika Olsen, Tim May, Aaron Garza, Eric Ehrenreich, and Alicia Roberts of the Public Safety and Homeland Security Bureau.

During our meeting we discussed the Commission's and Bandwidth's efforts to advance emergency services through deployment of Next Generation 911 ("NG911") networks and Text-to-911 services. Bandwidth provided perspectives on its real-world experience as an integrated provider of wholesale and retail VoIP and SMS services combined with its role as an emergency services provider to carrier and VoIP provider customers, which among other things included details related to Bandwidth's implementation of the Alabama NG911 network. In the discussions Bandwidth provided its perspectives on technical and financial considerations associated with deploying NG911 networks and how Text-to-911 traffic considerations can be best incorporated in the NG911 context. Bandwidth emphasized that in order to capture the highest value from NG911 deployments, carriers, including wireline and wireless carriers supporting Text-to-911, should be able to deliver traffic to the NG911 network in IP format. Bandwidth reiterated its belief that a fundamental goal of the Commission's Text-to-911 efforts should be

avoiding unnecessary consumer confusion in the marketplace. Finally, Bandwidth also discussed traffic integrity and consumer protection issues that it is experiencing as a result of non-carriers use of non-standardized and unregulated routing schemes that are likely to have public safety implications as well.

In accordance with Section 1.1206(b), this *ex parte* notification is being filed electronically for inclusion in the public record of the above proceeding. Should there be any questions or concerns regarding this filing, please direct them to the undersigned.

Sincerely,

/s/ *Greg Rogers*

Greg Rogers

cc: Henning Schulzrinne
David Furth
David Siehl
Erika Olsen
Tim May
Aaron Garza
Eric Ehrenreich